

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS**

TODD RAMSEY, et al.,

*Plaintiffs,*

v.

PHILIPS NORTH AMERICA LLC,

*Defendant.*

No. 3:18-cv-1099-NJR -RJD

**JOINT MOTION FOR FINAL APPROVAL OF CLASS SETTLEMENT**

Plaintiffs and Defendant jointly move under Federal Rule of Civil Procedure 23(e) for final approval of the Settlement [Doc. 7-1] and for the Court to enter the proposed Final Order and Judgment (attached hereto). For Plaintiffs' part, this motion is supported by Plaintiffs' Memorandum of Law in Support of the Joint Motion for Preliminary Approval of Class Settlement [Doc. 8], as well as Plaintiffs' Memorandum in Support of Plaintiffs' Motion for Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards for Named Plaintiffs [Doc. 21], the Declaration of Richard Simmons, President of Analytics, LLC (attached hereto as Ex. 1), and the Statement of Arthur J. Gallagher & Co., as the Independent Fiduciary, approving of the settlement, including fees and expenses (attached hereto as Ex. 2), as well as this Court's Order Preliminarily Approving this Class Settlement [Doc. 19] and Plaintiffs' Memorandum in Support of this Motion.

Defendant joins in requesting that the Court enter an order finally approving the Settlement and enter judgment in the form that shall be separately submitted to the Court.

September 28, 2018

Respectfully submitted:

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### **CERTIFICATE OF SERVICE**

On September 28, 2018, I served this document on all parties via the Court's CM/ECF system.

/s/ Jerome J. Schlichter